

¹ FCC Call Sign WQJX500 through WQJX557, WQUP813 and WQUR911.

when KDOC-TV in Anaheim, California was relocated by the Commission to TV channel 12. Petitioner seeks relocation to Channel 15 so that it can resume operation.

LA County objected to Petitioner's request. LA County submitted substantial technical information in two separate filings demonstrating that interference to LA County's operations would result from the relocation. Petitioner's request remains pending at the Commission.

Petitioner now seeking a waiver of Section 74.15(f) of the Commission's Rules, which specifies that a station license will automatically expire after non-operation for one year or more. Petitioner requests that the Commission toll this time period until such time as the Commission acts on Petitioner's relocation request.

Since LA County's filing, TV Channel 15 interference to LA County's public safety operations has grown worse. As the Commission is aware, LA County is presently attempting to resolve interference from three separate TV Channel 15 or 16 authorizations. Further, LA County recently discovered that the Commission has apparently granted an authorization for a translator station in Bakersfield (FCC Call Sign K08MM, see attached map), in direct contravention of the initial Waiver Grant to LA County. Specifically, footnote 124 of LA County's Waiver Grant states as follows:

The authorization of TV Channel 15 for public safety use in Los Angeles will require LPTV, TV translator and Class A TV applicants to limit the predicted field strength of proposed facilities to 52 dBu at the protected 130-kilometer co-channel contour. Currently, low power TV applicants must limit their predicted field strength at this contour to the less restrictive 76 dBu to protect land mobile service on adjacent channels 14 and 16. In this regard, the grant of the waiver request to Los Angeles County would further restrict the use of channel 15 for digital low power TV operations at locations near the 130-km protected land mobile contour.

As shown in the attached map, the Commission erred in granted the authorization for K08MM, and which Petitioner now seeks to waive.

In this proceeding, the Commission must weigh important issues, and necessarily consider public safety first-response and disaster recovery, to chart a path which will instruct other LM/UHF-TV sharing situations. The Commission's deliberations must be thorough and considerate. At the same time, it is not LA County's desire for Petitioner's authorization to be revoked if there are alternative assignments possible. However, requiring K12PO to go on the air (on TV Channel 15) during this period of Commission deliberation would unnecessarily endanger public safety. On this basis, LA County is supportive of Petitioner's request to remain off the air during the pendency of this proceeding. A Waiver Grant or Tolling will allow the status quo to be maintained while Petitioner finds alternative facilities that will not cause interference to public safety.

WHEREFORE, the premises considered, it is respectfully requested that the Commission GRANT the Waiver Request submitted by Channel 51 of San Diego, Inc. for silent authority for K12PO during the pendency of this proceeding.

Respectfully Submitted,

LOS ANGELES COUNTY, CALIFORNIA

By: Alan S. Tilles, Esquire

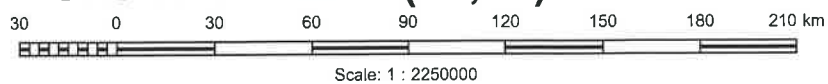
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Date: November 12, 2019



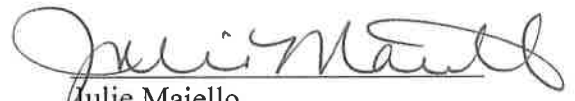
CH. 15 52 dBu F(50,10) Contours



CERTIFICATION OF SERVICE

I, Julie Maiello, an administrative assistant in the law firm of Shulman, Rogers, Gandal, Pordy & Ecker, P.A., hereby certifies that on this 12th day of November 2019, I sent a copy of the foregoing Comments of Los Angeles County, California via United States, postage prepaid regular mail to the following:

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Julie Maiello